

Edward N. Brandt, Jr., M.D.  
Assistant Secretary for Health  
Public Health Service  
Department of Health and Human  
Services  
Washington, DC 20201

Dear Dr. Brandt:

We are writing to follow up on our recent discussions of your request for a list of flavorings or additives commonly used in cigarettes manufactured in the United States by the major cigarette companies.

We appreciate the sensitivity you and other officials of the Department evidenced at our most recent meeting concerning the competitively sensitive nature of the information you have requested. The formulas for individual brands of cigarettes are, of course, highly guarded trade secrets. Disclosure of this information, even in some aggregate or composite form, could pose serious competitive difficulties for individual companies.

Moreover, premature and unwarranted publicity as to particular flavorings or additives continues to be a very real and legitimate concern. We are not aware of any substantial scientific evidence that the flavorings used in American cigarettes involve any hazard to health.

The subjects of additives and additive evaluation are necessarily complex and highly technical. This is implicit in your suggestion that the Department might establish a panel of experts to review materials submitted by the companies. With deference, we observe that many of the leading scientists in these areas are employed or retained by the companies, and we suggest that the Department might find it helpful at the outset of the development of any additive review procedures to consult with individuals who have dedicated their careers to these considerations.

Thus we propose the creation of a joint scientific task force to review the additives question and to determine what directions might be the most practical. Specifically, we would suggest that each cigarette manufacturer designate one scientist familiar with additives and that the Department designate its scientists. Designations could be exchanged for comment but should be accepted unless good cause is shown.

If this idea is acceptable, we should meet to discuss the scope of the joint scientific committee's responsibilities.

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